

COPY
FILE

BLEUS & ASSOCIATES, LLC
ATTORNEYS AT LAW
2633 DAKOTA, NE
ALBUQUERQUE, NM 87110

Tel: (505) 884-9300

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May 5, 2016

Via Facsimile (505) 256-0179 and First Class Mail

K-Mart Store
ATTN: LEGAL DEPARTMENT
2100 Carlisle Blvd NE
Albuquerque, NM 87110

RE: MY CLIENT: JONATHAN SORENSEN (DECEASED)
DATE: MAY 4, 2016
SUBJECT: PRESERVATION OF EVIDENCE

To Whom It May Concern:

I represent the estate of Mr. Jonathan Sorenson who was killed on May 4, 2016 in a K-Mart Store. His wrongful death occurred on May 4, 2016 at the K-Mart located at 2100 Carlisle Blvd NE in Albuquerque, New Mexico. This letter is a demand to preserve any and all evidence of this incident. This letter places you on notice that any destruction or alteration of any evidence relating to this incident will result in legal action.

I am specifically demanding that K-Mart preserve all records in any way relating to Mr. Sorensen's death, including video, photographs, images, surveillance footage, incident report(s), emails, memos, phone messages, texts, emails, calls, records witness statements, witness statement, human resource investigations, etc.


Please direct all correspondence, inquiries, or requests for interviews and information to my office. Should you have any questions or comments, contact me at the address provided.

Very truly yours,

BLEUS & ASSOCIATES, LLC


George Anthony Bleus, Esq.
Nicholas J. Rimmer, Esq.

NR/tlh

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>John M. Gwartana</i></p>	
<p>1. Article Addressed to:</p> <p>K-Mart Store Legal Department 2100 Carlisle Blvd NE Albuquerque NM 87110</p>  <p>9590 9402 1615 6053 4852 91</p>		<p>B. Received by (Printed Name) <i>John M. Gwartana</i></p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7015 0640 0001 2753 3163</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p> <p>Domestic Return Receipt</p>	

7015 0640 0001 2753 3163

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
ALBUQUERQUE NM 87110	
Certified Mail Fee	\$3.30
Extra Services & Fees (check box, add fee as appropriate)	\$2.70
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.47
Total Postage and Fees	\$6.47
Sent To K-Mart Store	
Street and Apt. No., or PO Box No. 2100 Carlisle Blvd. NE	
City, State, ZIP+4® Albuquerque NM 87110	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	



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FAX TRANSMITTAL SHEET

TO: Legal Department

COMPANY/FIRM: K-Mart Store

FAX NUMBER: (505) 256-0179

DATE: May 5, 2016

FROM: Bleus & Associates, LLC

RE: Incident of May 4, 2016

Number of pages, including cover sheet: (2)

MESSAGE:

Attached please find correspondence of today's date from attorney Nicolas J. Rimmer, Esq.

Thank you for your attention in this matter.

Tonja L. Heller,
Paralegal
George Anthony Bleus, Esq.
Nicholas J. Rimmer, Esq.

STATEMENT OF CONFIDENTIALITY

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